

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No. 19-34574-KRH

Chapter 7

**WITNESS LIST AND RELATED DECLARATION**

In accordance with Richmond General Orders 23-1 and 23-2, Lynn L. Tavenner, Trustee, not individually, but solely in her capacity as the Chapter 7 trustee (in such capacity, the “**Trustee**”) of the bankruptcy estate (the “**Estate**”) of LeClairRyan PLLC (“**LeClairRyan**” and/or the “**Debtor**”), in the above-referenced Chapter 7 case (the “**Case**”) hereby files, by counsel, a witness list and related declaration.

**WITNESS LIST**

In support of the relief requested in the items designated on the *Proposed Hearing Agenda* [ECF No. 1774], the Trustee submits the following list:

1. Lynn L. Tavenner, Chapter 7 trustee

**DECLARATION OF LYNN L. TAVENNER, TRUSTEE**

I, Lynn L. Tavenner, Trustee, not individually but solely in my capacity as the Chapter 7 Trustee of the LeClair Ryan Estate, pursuant to 28 USC § 1746, hereby declare as follows under penalty of perjury to the best of my knowledge, information, and belief:

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

1. I am the duly appointed Chapter 7 Trustee in the LeClairRyan Case.
2. I submit this declaration in support of: (a) Statement --NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (*Global Access Litigation Services/GALS-CR, Inc.* ) [ECF No. 1738]; (b) Statement --NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (I Witness Video Group) [ECF No. 1739]; (c) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (The Pettit Company Inc.)* [ECF No. 1740]; (d) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (William D. Janicki, Esquire)* [ECF No. 1741];(e)Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Keating & Walker Attorney Service, Inc.)* [ECF No. 1742]; (f) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Lian and Lien IP Attorneys)* [ECF No. 1743]; (g) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Rifkin Wiene Livingston LLC)* [ECF No. 1744]; (h) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Interstate Services)* [ECF No. 1745]; (i) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Drew & Napier, LLC)* [ECF No. 1746]; (j) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-*

*PETITION SEGREGATED FUNDS (Ungria International Inc.)* [ECF No. 1747]; (k) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Stokes & Associates, LLC)* [ECF No. 1748]; (l) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Barrister Digital Solutions, LLC)* [ECF No. 1749]; (m) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Metropolitan Court Reporter)* [ECF No. 1750]; and (n) Statement --*NOTICE OF HEARING ON TRUSTEES DISAGREEMENT WITH AMOUNT SOUGHT IN CLAIM IN POST-PETITION SEGREGATED FUNDS (Schulman, Wiegmann & Associates, PA)* [ECF No. 1751] (collectively, the “**CAPE Notices**” and each a “**CAPE Notice**”).

3. The statements in this Declaration are, except where specifically noted, based on my personal knowledge of information that I have obtained in connection with my role as Chapter 7 Trustee. If I were called upon to testify, I could and would competently testify to the facts set forth herein on that basis.

4. In connection with my responsibilities as Trustee, I have reviewed the numerous Claims in Post-Petition Segregated Funds submitted pursuant to this Court’s Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter. I compared these claims with the information found in the Debtor’s book and records. While I am extremely sympathetic to the plight of many of these vendors who clearly provided services to LeClairRyan and/or its clients and were not appropriately compensated for the same, my analysis was focused, and my conclusions are based, on whether the money was received by the Estate after the bankruptcy filing

or LeClairRyan before it sought bankruptcy relief. The former is the basis that allows me to distribute money from the CAPE account to the various vendors pursuant to this Court's specific order. Once I have completed the process for amounts received by the Estate, I will work with my counsel and propose to this Court a process to address the amounts in the CAPE account that were received before September 3, 2019.

5. In connection with the claim submitted by Global Access Litigation Services/GALS-CR, Inc., the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
200554	350.00	Invoice paid on 12/06/2019	Yes
200509	1,180.92	Invoice paid on 09/12/2019	Yes
200510	1,678.21	Invoice paid on 09/12/2019	Yes
200593	175.00	Invoice paid on 11/25/2019	Yes
200622	225.00	Invoice paid on 11/25/2019	Yes
200638	225.00	Invoice paid on 11/25/2019	Yes
200524	782.11	invoice paid on 07/29/2019	Yes
200534	679.55	invoice paid on 07/29/2019	Yes
200621	150.00	Invoice paid on 08/09/2019	Yes
200522	3,243.90	invoice paid on 07/29/2019	Yes
200576	1,899.08	Invoice paid on 07/30/2019	Yes

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Global Access Litigation Services/GALS-CR, Inc. is entitled to receive \$ 3,834.13, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Global Access Litigation Services/GALS-CR, Inc. of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Global Access Litigation Services/GALS-CR, Inc. Based on email correspondence, I understand that Global Access Litigation Services/GALS-CR, Inc. agrees with my position, and

as such, I will tender the undisputed amount to Global Access Litigation Services/GALS-CR, Inc. and not reserve any additional amount for this claim.

6. In connection with the claim submitted by I Witness Video Group, the Debtor's books and records indicate the following:

<b><u>Vendor Invoice #</u></b>	<b><u>Amount</u></b>	<b><u>Client Payment Status</u></b>	<b><u>Unpaid in AP</u></b>
47026	1,155.00	Invoice paid on 07/29/2019	Yes
47034	<b>1,107.50</b>	Invoice paid on 10/21/2019	Yes

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, I Witness Video Group is entitled to receive \$1,107.50, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified I Witness Video Group of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for I Witness Video Group. Based on email correspondence, I understand that I Witness Video Group agrees with my position, and as such, I will tender the undisputed amount to I Witness Video Group and not reserve any additional amount for this claim.

7. In connection with the claim submitted by The Pettit Company Inc., the Debtor's books and records indicate the following:

<b><u>Vendor Invoice #</u></b>	<b><u>Amount</u></b>	<b><u>Client Payment Status</u></b>	<b><u>Unpaid in AP</u></b>
96667	20.00	Invoice has not been paid	Yes
96668	35.00	Invoice has not been paid	Yes
96673	20.00	Invoice has not been paid	Yes
96674	35.00	Invoice has not been paid	Yes

96677	105.00	Invoice has not been paid	Yes
96703	90.00	Invoice has not been paid	Yes
96837	171.00	Invoice paid on 05/01/2019	Yes
97334	350.00	Unbilled	Yes
97356	200.00	Unbilled	Yes
97700	35.00	Invoice has not been paid	Yes
97701	35.00	Invoice has not been paid	Yes
97971	<b>20.00</b>	Invoice paid on 10/01/2019	Yes
98044	<b>455.00</b>	Invoice paid on 10/01/2019	Yes

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, The Pettit Company Inc. is entitled to receive \$ 475.00, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified The Pettit Company Inc. of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for The Pettit Company Inc. Based on my conversation with Maverick Pettitt, I understand that The Pettit Company Inc. agrees with my position, and as such, I will tender the undisputed amount to The Pettit Company Inc. and not reserve any additional amount for this claim.

8. In connection with the claim submitted by William D. Janicki, Esquire, the Debtor's books and records indicate that no amount that Mr. Janicki contributed to the firm in the context of a capital contribution in 2018 was part of the Post-Petition Segregated Funds. Furthermore, I have neither seen an accounting of a separate bank account nor located a bank account that segregated member capital contributions from other funds received by the firm. As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Mr. Janicki is not entitled to receive any part of the Post-Petition

Segregated Funds. My counsel notified Mr. Janicki of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice, a copy of which is attached hereto as Exhibit A. It appears that the physical address and email address on Mr. Janicki's claim, which was used by my counsel to mail and email the letter, may no longer be accurate. And I am unclear as to whether the letter has been forwarded to Mr. Janicki. After additional research, I believe I have located additional potential addresses for Mr. Janicki and intend to provide correspondence to those addresses. As such, I believe it appropriate to continue this matter for a month.

9. In connection with the claim submitted by Keating & Walker Attorney Service, Inc., the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
134764	<b>85.00</b>	Invoice paid on 10/07/2019	Yes
135038R	100.00	Invoice paid on 07/23/2019	Yes
135544	<b>85.00</b>	Invoice paid on 09/20/2019	Yes
135750	190.00	Unbilled	Yes
125773	275.00	Invoice unpaid	Yes
126758	213.50	Invoice not in Elite	Yes
128891	112.45	Invoice not in Elite	Yes
132186	330.00	Invoice paid on 08/23/2019	Yes
132565R	99.80	Invoice paid on 07/23/2019	Yes

As such, I maintain that pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Keating & Walker Attorney Service, Inc. is entitled to receive \$170.00, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Keating & Walker Attorney Service, Inc. of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Keating & Walker Attorney Service, Inc., a copy of which is attached hereto as Exhibit B.

10. In connection with the claim submitted by Lian and Lien IP Attorneys, the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
LLP180019LCR	565.00	Invoice paid on 08/16/2019	No
LLP180020LCR	500.00	Invoice paid on 08/16/2019	No
LLP180021LCR	509.00	Invoice paid on 05/26/2019	No
LLP180022LCR	234.52	Invoice paid on 09/17/2018	No
LLP180023LCR	565.00	Invoice paid on 09/17/2018	No
LLP180024LCR	334.00	Invoice paid on 09/17/2018	No
LLP180025LCR	563.77	Invoice paid on 08/20/2019	No
LLP180026LCR	507.39	Invoice paid on 10/15/2018	No
LLP180027LCR	507.39	Invoice paid on 10/15/2018	No
LLP180028LCR	431.00	Invoice paid on 10/15/2018	No
LLP180030LCR	539.00	Invoice paid on 10/15/2018	No
LLP180031LCR	319.00	Invoice paid on 10/15/2018	No
LLP180118LCR	471.00	Invoice paid on 03/13/2019	No
LLP190085LCR	<b>456.81</b>	Invoice paid on 09/19/2019	Yes
LLP190086LCR	<b>322.54</b>	Invoice paid on 09/19/2019	Yes
LLP190098LCR	<b>322.54</b>	Invoice paid on 09/19/2019	Yes
LLP190101LCR	<b>322.54</b>	Invoice paid on 09/19/2019	Yes
LLP190102LCR	<b>322.54</b>	Invoice paid on 09/19/2019	Yes
LLP190111LCR	<b>515.73</b>	Invoice paid on 09/19/2019	Yes
LLP190112LCR	<b>287.69</b>	Invoice paid on 09/19/2019	Yes
LLP190113LCR	<b>517.34</b>	Invoice paid on 09/19/2019	Yes
LLP190114LCR	<b>287.69</b>	Invoice paid on 09/19/2019	Yes
LLP190115LCR	<b>517.34</b>	Invoice paid on 09/19/2019	Yes
LLP190116LCR	<b>517.34</b>	Invoice paid on 09/19/2019	Yes
LLP190117LCR	<b>325.73</b>	Invoice paid on 10/18/2019	Yes
LLP190118LCR	<b>325.73</b>	Invoice paid on 10/18/2019	Yes
LLP190119LCR	<b>325.73</b>	Invoice paid on 10/18/2019	Yes
LLP190120LCR	<b>325.73</b>	Invoice paid on 10/18/2019	Yes
LLP190121LCR	<b>325.73</b>	Invoice paid on 10/18/2019	Yes
LLP190122LCR	<b>171.31</b>	Invoice paid on 09/19/2019	Yes
LLP190123LCR	<b>513.93</b>	Invoice paid on 09/19/2019	Yes
LLP190124LCR	<b>513.93</b>	Invoice paid on 09/19/2019	Yes
LLP190125LCR	<b>513.93</b>	Invoice paid on 09/19/2019	Yes
LLP190126LCR	<b>171.31</b>	Invoice paid on 09/19/2019	Yes
LLP190127LCR	130.00	Invoice not in Elite	



LLP190128LCR	130.00	Invoice not in Elite	
LLP190129LCR	130.00	Invoice not in Elite	
LLP190130LCR	130.00	Invoice not in Elite	
LLP190131LCR	130.00	Invoice not in Elite	
LLP190132LCR	130.00	Invoice not in Elite	
LLP190133LCR	130.00	Invoice not in Elite	
LLP190134LCR	130.00	Invoice not in Elite	
LLP190135LCR	<b>516.36</b>	Invoice paid on 10/18/2019	Yes
LLP190136LCR	<b>229.02</b>	Invoice paid on 10/18/2019	Yes
LLP190137LCR	<b>172.12</b>	Invoice paid on 10/18/2019	Yes
LLP1901038LCR	<b>516.36</b>	Invoice paid on 10/18/2019	Yes
LLP190139LCR	<b>287.18</b>	Invoice paid on 10/18/2019	Yes
LLP190140LCR	<b>516.36</b>	Invoice paid on 10/18/2019	Yes
LLP190141LCR	<b>331.92</b>	Invoice paid on 10/18/2019	Yes
LLP190142LCR	<b>441.80</b>	Invoice paid on 10/18/2019	Yes
LLP190143LCR	<b>287.25</b>	Invoice paid on 10/18/2019	Yes
LLP190144LCR	<b>344.37</b>	Invoice paid on 10/18/2019	Yes
LLP190145LCR	<b>516.63</b>	Invoice paid on 10/18/2019	Yes
LLP190146LCR	<b>516.63</b>	Invoice paid on 10/18/2019	Yes
LLP190147LCR	<b>516.63</b>	Invoice paid on 10/18/2019	Yes
LLP190148LCR	<b>516.63</b>	Invoice paid on 10/18/2019	Yes
LLP190149LCR	126.00	Invoice not in Elite	
LLP190150LCR	272.00	Invoice not in Elite	
LLP190151LCR	489.00	Invoice not in Elite	
LLP190152LCR	272.00	Invoice not in Elite	
LLTO18116	3,016.00	Invoice not in Elite	

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Lian and Lien IP Attorneys is entitled to receive \$13,612.42, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Lian and Lien IP Attorneys of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Lian and Lien IP Attorneys. Based on email correspondence, I understand that Lian and Lien IP Attorneys agrees with my position, and

as such, I will tender the undisputed amount to Lian and Lien IP Attorneys and not reserve any additional amount for this claim.

11. In connection with the claim submitted by Rifkin Wiene Livingston LLC, the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
52677	5,087.25	Invoice paid 08/19/2019	Yes
52773	5,967.50	Invoice paid 08/19/2019	Yes
52845	10,368.98	Invoice paid 08/19/2019	Yes
53018	162.82	Invoice not in Elite	

As such, I maintain that pursuant, to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Rifkin Wiene Livingston LLC is not entitled to receive any part of the Post-Petition Segregated Funds. My counsel notified Rifkin Wiene Livingston LLC of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Rifkin Wiene Livingston LLC. Based on email correspondence, I understand that agrees Rifkin Wiene Livingston LLC with my position, and as such, I will tender no funds to Rifkin Wiene Livingston LLC and not reserve any amount for this claim.

12. In connection with the claim submitted by Interstate Services, the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
S15003	183.00	Invoice paid on 06/18/2019	Yes
S15134	<b>183.00</b>	Invoice paid on 09/19/2019	Yes
S15282	186.00	Invoice not in Elite	
S15411	183.00	Invoice not in Elite	

S15501	183.00	Invoice not in Elite	
S15517	12.00	Invoice not in Elite	
S15825	450.00	Invoice not in Elite	

As such, I maintain that pursuant, to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Interstate Services is entitled to receive \$183.00, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Interstate Services of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Interstate Services. Based on a telephone call between Mr. Steve Wayland and my counsel, Paula Beran, I understand that Interstate Services agrees with my position, and as such, I will tender the undisputed amount to Interstate Services and not reserve any additional amount for this claim.

13. In connection with the claim submitted by Drew & Napier, LLC., the Debtor's books and records indicate the following:

10595674	1,236.89	Paid 08/12/2019	unpaid
10595921	283.47	Paid 08/12/2019	unpaid
10597588	597.56	Paid 07/15/2019	unpaid
10597923	154.92	Not paid	unpaid
10597924	157.92	Not paid	unpaid
10599909	<b>463.21</b>	Paid 09/10/2019	unpaid
10601901	<b>995.90</b>	Paid 11/07/2019	unpaid
10602459	<b>905.74</b>	Paid 11/07/2019	unpaid
10602555	<b>528.69</b>	Paid 11/07/2019	unpaid
10602962	<b>1,815.77</b>	Paid 10/03/2019	unpaid
10602964	<b>3,081.15</b>	Paid 11/07/2019	unpaid
10603408	1,171.31	Not paid	unpaid
10604975	794.26		Invoice not in accounting system

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Drew & Napier, LLC is entitled to receive \$7,790.46, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Drew & Napier, LLC of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Drew & Napier, LLC. Based on email correspondence, I understand that Drew & Napier, LLC agrees with my position, and as such, I will tender the undisputed amount to Drew & Napier, LLC and not reserve any additional amount for this claim.

14. In connection with what I understood was the claim submitted by Ungria International Inc., the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
6609518	2,890.00	Paid 07/19/2019	Paid
6610918	1,263.00	Paid 03/04/2019	Paid
6611018	295.00	Paid 03/04/2019	Paid
6618718	395.00	Paid 03/04/2019	Paid
6618918	395.00	Paid 03/04/2019	Paid
6619618	395.00	Paid 03/04/2019	Paid
6630219	821.00	Paid 05/01/2019	Paid
6630319	402.00	Paid 05/01/2019	Paid
6630419	395.00	Paid 05/01/2019	Paid
6630519	395.00	Paid 05/01/2019	Paid
6634419	648.00	Paid 05/01/2019	Paid
6634519	742.00	Paid 05/01/2019	Paid
6634619	545.00	Paid 05/01/2019	Paid
6647919	295.00	Paid 05/01/2019	Paid
6662319	755.00	Paid 07/19/2019	Paid
6663719	2,709.00	Paid 05/01/2019	Paid
6664819	1,145.00	Paid 05/29/2019	Paid
6664919	700.00	Paid 07/19/2019	Paid

6672619	195.00	Paid 07/19/2019	unpaid
6684419	650.00	Paid 07/19/2019	unpaid
6702319	2,090.00	Paid 07/19/2019	Paid
6702519	790.00	Paid 08/12/2019	Paid
6703519	3,830.00	Paid 07/19/2019	Paid
6712519	295.00	Paid 08/12/2019	unpaid

As such, I maintained that pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Ungria International Inc. is entitled to receive no amount. My counsel notified Ungria International Inc. of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Ungria International Inc. After email correspondence that clarified certain things, I again reviewed the Debtor's books and records which indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
66,726/19	\$195.00	Paid 7/19/19	Yes
66,844/19	\$650.00	Paid 7/19/19	Yes
67,125/19	\$295.00	Paid 8/12/19	Yes
67,274/19	\$1,995.00	Paid 8/12/19	Yes
67,285/19	\$2,890.00	Paid 8/12/19	Yes
67,410/19	<b>\$1,003.00</b>	Paid 9/10/19	Yes
67,422/19	<b>\$2,795.00</b>	Paid 9/10/19	Yes
67,472/19	<b>\$700.00</b>	Paid 9/10/19	Yes
67,681/19	<b>\$695.00</b>	Paid 9/10/19	Yes
67,756/19	<b>\$1,362.00</b>	Paid 9/10/19	Yes

Based on this additional review, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Ungria International Inc. is

entitled to receive \$6,555.00, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019 This was conveyed to Ungria International Inc in an email and a phone conversation. Based on that correspondence, I understand that Ungria International Inc. agrees with my position, and as such, I will tender the undisputed amount to Ungria International Inc and not reserve any additional amount for this claim.

15. In connection with the claim submitted by Stokes & Associates, LLC., the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
674	175.00	Not charged to client	Paid
6713	400.00	Paid 11/02/2018	Paid
676	350.00	Paid 08/15/2017	Paid
1	100.00	Paid 04/30/2019	Paid
1	200.00	Paid 07/23/2019	unpaid
1	<b>200.00</b>	Paid 10/18/2019	unpaid
1	120.00	Paid 07/29/2019	unpaid
1	120.00	Paid 07/29/2019	unpaid

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Stokes & Associates, LLC is entitled to receive \$200.00, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Stokes & Associates, LLC of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Stokes & Associates, LLC, a copy of which is attached hereto as Exhibit C.

16. In connection with the claim submitted by Barrister Digital Solutions, LLC, the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
65131	310.21	Invoice paid 08/19/2019	Yes
65104	238.50	Invoice paid 08/19/2019	Yes
65132	4,805.67	Invoice paid 08/19/2019	Yes
65083	5,186.56	Invoice paid 08/19/2019	Yes
64824	66.25	Client did not pay costs	Yes
64921	<b>45.16</b>	Invoice paid on 09/10/2019	Yes
64392	302.34	Invoice paid 08/19/2019	Yes
64391	3,960.09	Invoice paid 08/19/2019	Yes
64757	182.55	Invoice paid 08/19/2019	Yes
64756	274.22	Invoice paid 08/19/2019	Yes
64755	319.17	Invoice paid 08/19/2019	Yes
64753	5,545.58	Invoice paid 08/19/2019	Yes
64799	576.06	Invoice paid 08/19/2019	Yes
64636	<b>64.66</b>	Invoice paid on 09/10/2019	Yes
64138	270.30	Client not billed	Yes

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Barrister Digital Solutions is entitled to receive \$109.82, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Barrister Digital Solutions of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Barrister Digital Solutions, a copy of which is attached hereto as Exhibit D. The letter contained a typographical error that involves a 10 cents difference.

17. In connection with the claim submitted by Metropolitan Court Reporter, the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
206273	<b>381.80</b>	Paid 11/04/2019	unpaid
206329	489.50		Invoice not in accounting system

As such, I maintain that pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Metropolitan Court Reporter is entitled to receive \$381.80, which is the sum of the invoices paid and amounts received by the Estate after September 3, 2019. My counsel notified Metropolitan Court Reporter of this position in a letter dated February 8, 2023, which had as an enclosure the respective CAPE Notice for Metropolitan Court Reporter. Based on email correspondence, I understand that Metropolitan Court Reporter agrees with my position, and as such, I will tender the undisputed amount to Metropolitan Court Reporter and not reserve any additional amount for this claim.

18. In connection with the claim submitted by Schulman, Wiegmann & Associates, PA., the Debtor's books and records indicate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
77333	2,731.66	Not paid	yes
78331	400.50	Not paid	yes
78747	2,500.30	Not paid	yes
79062	528.50	Not paid	yes

As such, I maintain that, pursuant to this Court's Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, Schulman, Wiegmann & Associates, PA. is not entitled to receive any part of the Post-Petition Segregated Funds. My counsel notified Schulman, Wiegmann & Associates, PA. of this position in a letter dated February 8, 2023, which had as an enclosure



the respective CAPE Notice for Schulman, Wiegmann & Associates, PA., a copy of which is attached hereto as Exhibit E.

### **Case Reports**

19. As of the filing of this Declaration, the Estate funds in my possession are as follows: \$258,644.66 (Signature Bank- Regular); \$15,997,012.00 (Signature Bank – Money Market); \$198,925.48 (Operating Account – HSBC); \$1,058,503.63 (commonly referred to as CAPE account).

20. To the best of my knowledge, information, and belief, I declare under penalty of perjury that the foregoing is true and correct.

### **LYNN L. TAVENNER, CHAPTER 7 TRUSTEE**

Dated: February 22, 2023  
Richmond, Virginia

By: /s/ Lynn L. Tavenner  
Lynn L. Tavenner, Chapter 7 Trustee

Respectfully submitted,  
**LYNN L. TAVENNER, CHAPTER 7 TRUSTEE**

Dated: February 22, 2023  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
PBeran@TB-LawFirm.com  
Tavenner & Beran, PLC  
20 North 8<sup>th</sup> Street  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I certify that on this 22nd day of February 2023, a true copy of the foregoing Witness List and Related Declaration was sent electronically to:

Shannon F. Pecoraro, Esquire (Va. Bar No. 46864)  
Department of Justice  
Office of the United States Trustee  
701 East Broad Street, Suite 4304  
Richmond, Virginia 23219

And all other parties receiving CM/ECF notices in this Case.

/s/ Paula S. Beran  
Paula S. Beran, Esquire  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

## Tavener & Beran, PLC

ATTORNEYS AT LAW

PAULA S. BERAN  
PBERAN@TB-LAWFIRM.COM

20 NORTH EIGHTH STREET, 2ND FLOOR  
RICHMOND, VIRGINIA 23219  
TELEPHONE: (804) 783-8300  
FACSIMILE: (804) 783-0178

FILE NUMBER:

February 8, 2023

William D. Janicki, Esquire  
1013 Galleria Boulevard Suite 250  
Roseville, CA 95678-1365  
[WJanicki@fmglaw.com](mailto:WJanicki@fmglaw.com)

RE: LeClairRyan PLLC 19-34574-KRH

Dear Mr. Janicki,

Lynn L. Tavenner, Trustee, (the “**Trustee**”) and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, (the “**Debtor**”) is in receipt of your request of \$100,000.00 (“**CAPE Claim**”) submitted in connection with the Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, ECF No. 383 (the “**Order**”). After vetting the CAPE Claim against the Debtor’s books and records, the Order, and applicable law, the Trustee disputes that you have a valid claim and/or interest in any portion of the Post-Petition Segregated Funds. The Post-Petition Segregated Funds in the Segregated Account were received after September 3, 2019. As such, no amounts that you contributed in 2018 are part of the Post-Petition Segregated Funds. Furthermore, the Trustee has neither seen an accounting of a separate bank account nor located a bank account that segregates member capital contributions from other funds received by the Debtor. Based on the same and other information, the Trustee maintains that you are not entitled to any of the Post-Petition Segregated Funds.

Pursuant to the Order, if you disagree with the Trustee’s position and desire to continue to pursue your claim to \$100,000 from the Post-Petition Segregated Funds, you must establish your entitlement at a hearing on February 23, 2023 as further provided on the Notice of Hearing on Trustee’s Disagreement with Amount Sought in Claim in Post-Petition Segregated Funds enclosed herewith.

Please feel free to contact me at [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com) with any questions. I look forward to hearing your position on this matter.

Very truly yours,

  
Paula S. Beran

cc: Lynn L. Tavenner, Trustee (w/out encl.)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**Notice of Hearing on Trustee's Disagreement with  
Amount Sought in Claim in Post-Petition Segregated Funds**  
**(William D. Janicki, Esquire)**

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case by counsel, pursuant to the *Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*,<sup>2</sup> ECF. No. 383, (the “**Order**”) hereby provides notice that she disagrees with the amount sought by William D. Janicki, Esquire (“**Claimant**”) in his Claim in Post-Petition Segregated Funds. Pursuant to the Order, a hearing on this matter will be held on **February 23, 2023, at 1 P.M.** (or such time thereafter as the matter may be heard) before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

<sup>2</sup> Terms not otherwise defined herein shall have the meanings given them in the *Motion for Entry of an Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*, Docket No. 347.

Street Richmond, Virginia 23219. In accordance with Richmond General Order 22-2, unless ordered otherwise, the hearing will be conducted both in person and via Zoom with a listen-only line available.

Zoom registration link:

[https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc\\_yNBzn2fS2zA4Uw](https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc_yNBzn2fS2zA4Uw)

Listen-only conference line:

Dial: 1-866-590-5055  
Access Code: 4377075  
Security Code: 22323

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: February 8, 2023  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of February 2023, a true and correct copy of the foregoing Notice has been sent to the Claimant as follows:

William D. Janicki, Esquire  
1013 Galleria Boulevard Suite 250  
Roseville, CA 95678-1365

WJanicki@fmglaw.com

/s/ Paula S. Beran  
Counsel

**Tavener & Beran, PLC**  
**ATTORNEYS AT LAW**

PAULA S. BERAN  
PBERAN@TB-LAWFIRM.COM

20 NORTH EIGHTH STREET, 2ND FLOOR  
RICHMOND, VIRGINIA 23219  
TELEPHONE: (804) 783-8300  
FACSIMILE: (804) 783-0178

FILE NUMBER:

February 8, 2023

John J. Walker, President  
Keating & Walker Attorney Service, Inc.  
816 Nassau Street - Suite 816  
New York NY, 10038  
[Service@Keatingandwalker.com](mailto:Service@Keatingandwalker.com)

RE: LeClairRyan PLLC 19-34574-KRH

Dear Claimant,

Lynn L. Tavenner, Trustee, (the “**Trustee**”) and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, (the “**Debtor**”) is in receipt of the request (“**CAPE Claim**”) of Keating & Walker Attorney Service, Inc. (the “**Claimant**”) submitted in connection with the Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, ECF No. 383 (the “**Order**”). After vetting the CAPE Claim against the Debtor’s books and records, the Order, and applicable law, the Trustee disputes that the Claimant has the claimed interest in Post-Petition Segregated Funds. The Debtor’s books and records demonstrate the following:

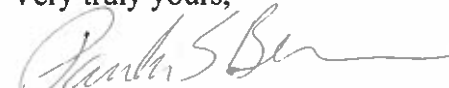
<b><u>Vendor Invoice #</u></b>	<b><u>Amount</u></b>	<b><u>Client Payment Status</u></b>	<b><u>Unpaid in AP</u></b>
134764	85.00	Invoice paid on 10/07/2019	Yes
135038R	100.00	Invoice cost paid on 07/23/2019	Yes
135544	85.00	Invoice paid on 09/20/2019	Yes
135750	190.00	Unbilled	Yes
125773	275.00	Check was voided and reversed no longer needed	
126758	213.50	Invoice not in Elite	Yes
128891	112.45	Invoice not in Elite	Yes
132186	330.00	Invoice paid on 08/23/2019	Yes
132565R	99.80	Invoice paid on 07/23/2019	Yes

Based on the same and other information, the Trustee maintains that (a) the Claimant is entitled to receive \$ 170.00 from the Post-Petition Segregated Funds and (b) all remaining amounts sought in the CAPE Claim should be disallowed for any and all purposes related to the Post-Petition Segregated Funds.

Pursuant to the Order, if you: (1) agree with the Trustee's position, she is authorized to distribute to the Claimant \$ 170.00, and the remaining portion of the claimed interest in the Post-Petition Segregated Funds may be released from the Segregated Account and placed in the Estate's operating account for use in the administration of the Chapter 7 Estate consistent with any cash collateral order entered by this Court; or (2) disagree with the Trustee's position, no said funds claimed therein shall be disbursed from the Segregated Account absent further order of the Bankruptcy Court and the Trustee will have the allowance/disallowance on said Claim in Post-Petition Segregated Funds heard by the Bankruptcy Court as further provided on the Notice of Hearing on Trustee's Disagreement with Amount Sought in Claim in Post-Petition Segregated Funds enclosed herewith.

Please feel free to contact me at [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com) with any questions. I look forward to hearing your position on this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Paula S. Beran", written in a cursive style.

Paula S. Beran

cc: Lynn L. Tavenner, Trustee (w/out encl.)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**Notice of Hearing on Trustee's Disagreement with  
Amount Sought in Claim in Post-Petition Segregated Funds**

Keating & Walker Attorney Service, Inc.

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case by counsel, pursuant to the *Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*,<sup>2</sup> ECF. No. 383 (the “**Order**”) hereby provides notice that she disagrees with the amount sought by Keating & Walker Attorney Service, Inc. (“**Claimant**”) in its Claim in Post-Petition Segregated Funds. Pursuant to the Order, a hearing on this matter will be held on **February 23, 2023, at 1 P.M.** (or such time thereafter as the matter may be heard) before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse,

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

<sup>2</sup> Terms not otherwise defined herein shall have the meanings given them in the *Motion for Entry of an Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*, Docket No. 347.

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Paula S. Beran, Esquire (Va. Bar No. 34679)

Tavenner & Beran, PLC

20 North Eighth Street, Second Floor

Richmond, Virginia 23219

Telephone: (804) 783-8300

*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*



701 E. Broad Street Richmond, Virginia 23219. In accordance with Richmond General Order 22-2, unless ordered otherwise, the hearing will be conducted both in person and via Zoom with a listen-only line available.

Zoom registration link:

[https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc\\_yNBzn2fS2zA4Uw](https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc_yNBzn2fS2zA4Uw)

Listen-only conference line:

Dial: 1-866-590-5055  
Access Code: 4377075  
Security Code: 22323

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: February 8, 2023  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of February 2023, a true and correct copy of the foregoing Notice has been sent to the Claimant as follows: (1) mailed to 816 Nassau Street - Suite 816 New York NY, 10038 (attn: John J. Walker, Pres.); and (2) mailed electronically to [Service@Keatingandwalker.com](mailto:Service@Keatingandwalker.com).

/s/ Paula S. Beran  
Counsel

**Tavener & Beran, PLC**  
**ATTORNEYS AT LAW**

PAULA S. BERAN  
PBERAN@TB-LAWFIRM.COM

20 NORTH EIGHTH STREET, 2ND FLOOR  
RICHMOND, VIRGINIA 23219  
TELEPHONE: (804) 783-8300  
FACSIMILE: (804) 783-0178

FILE NUMBER:

Ralph E. Stokes  
[Stokes.ralph@gmail.com](mailto:Stokes.ralph@gmail.com)

Matthew E. Stokes, Real Estate Title Examiner  
[mstokes650@gmail.com](mailto:mstokes650@gmail.com)

Stokes & Associates, LLC  
112 New Road  
Exeter, RI 02822

RE: LeClairRyan PLLC 19-34574-KRH

Dear Claimant,

Lynn L. Tavenner, Trustee, (the “**Trustee**”) and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, (the “**Debtor**”) is in receipt of the request (“**CAPE Claim**”) Stokes & Associates, LLC (the “**Claimant**”) submitted in connection with the Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, ECF No. 383 (the “**Order**”). After vetting the CAPE Claim against the Debtor’s books and records, the Order, and applicable law, the Trustee disputes that the Claimant has the claimed interest in Post-Petition Segregated Funds. The Debtor’s books and records demonstrate the following:

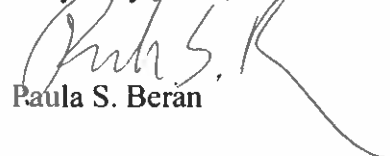
<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
674	175.00	Not charged to client	Paid
6713	400.00	Paid 11/02/2018	Paid
676	350.00	Paid 08/15/2017	Paid
1	100.00	Paid 04/30/2019	Paid
1	200.00	Paid 07/23/2019	unpaid
1	200.00	Paid 10/18/2019	unpaid
1	120.00	Paid 07/29/2019	unpaid
1	120.00	Paid 07/29/2019	unpaid

Based on the same and other information, the Trustee maintains that (a) the Claimant is entitled to receive \$ 200.00 from the Post-Petition Segregated Funds and (b) all remaining amounts sought in the CAPE Claim should be disallowed for any and all purposes related to the Post-Petition Segregated Funds.

Pursuant to the Order, if you: (1) agree with the Trustee's position, she is authorized to distribute to the Claimant \$ 200.00, and the remaining portion of the claimed interest in the Post-Petition Segregated Funds may be released from the Segregated Account and placed in the Estate's operating account for use in the administration of the Chapter 7 Estate consistent with any cash collateral order entered by this Court; or (2) disagree with the Trustee's position, no said funds claimed therein shall be disbursed from the Segregated Account absent further order of the Bankruptcy Court and the Trustee will have the allowance/disallowance on said Claim in Post-Petition Segregated Funds heard by the Bankruptcy Court as further provided on the Notice of Hearing on Trustee's Disagreement with Amount Sought in Claim in Post-Petition Segregated Funds enclosed herewith.

Please feel free to contact me at [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com) with any questions. I look forward to hearing your position on this matter.

Very truly yours,

  
Paula S. Beran

cc: Lynn L. Tavenner, Trustee (w/out encl.)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**Notice of Hearing on Trustee's Disagreement with  
Amount Sought in Claim in Post-Petition Segregated Funds**  
Stokes & Associates, LLC

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case by counsel, pursuant to the *Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*,<sup>2</sup> ECF No. 383 (the “**Order**”) hereby provides notice that she disagrees with the amount sought by Stokes & Associates, LLC (“**Claimant**”) in its Claim in Post-Petition Segregated Funds. Pursuant to the Order, a hearing on this matter will be held on **February 23, 2023, at 1 P.M.** (or such time thereafter as the matter may be heard) before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond,

---

<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

<sup>2</sup> Terms not otherwise defined herein shall have the meanings given them in the *Motion for Entry of an Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*, Docket No. 347.

Virginia 23219. In accordance with Richmond General Order 22-2, unless ordered otherwise, the hearing will be conducted both in person and via Zoom with a listen-only line available.

Zoom registration link:

[https://www.zoomgov.com/meeting/register/vJIscemprTksExn9Ogrc\\_yNBzn2fS2zA4Uw](https://www.zoomgov.com/meeting/register/vJIscemprTksExn9Ogrc_yNBzn2fS2zA4Uw)

Listen-only conference line:

Dial: 1-866-590-5055  
Access Code: 4377075  
Security Code: 22323

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: February 8, 2023  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of February 2023, a true and correct copy of the foregoing Notice has been sent to the Claimant as follows: (1) mailed to 112 New Road Exeter, RI 02822 (attn: Ralph E.Stokes); (2) mailed electronically to [Stokes.ralph@gmail.com](mailto:Stokes.ralph@gmail.com); and (3) mailed electronically to [mstokes650@gmail.com](mailto:mstokes650@gmail.com).

/s/ Paula S. Beran  
Counsel

**Tavener & Beran, PLC**

Exhibit D

ATTORNEYS AT LAWPAULA S. BERAN  
PBERAN@TB-LAWFIRM.COM20 NORTH EIGHTH STREET, 2ND FLOOR  
RICHMOND, VIRGINIA 23219  
TELEPHONE: (804) 783-8300  
FACSIMILE: (804) 783-0178

FILE NUMBER:

February 8, 2023

Barrister Digital Solutions, LLC  
Attn: Rita DeSilva  
1700 K ST. NW, Suite B-100  
Washington, DC 20006Barrister Digital Solutions, LLC  
Attn: Rita DeSilva  
10790 Parkridge Boulevard, Suite 30  
Reston, VA 2091

RE: LeClairRyan PLLC 19-34574-KRH

Dear Claimant,

Lynn L. Tavenner, Trustee, (the “**Trustee**”) and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, (the “**Debtor**”) is in receipt of the request (“**CAPE Claim**”) of Barrister Digital Solutions, LLC (the “**Claimant**”) submitted in connection with the Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, ECF No. 383 (the “**Order**”). After vetting the CAPE Claim against the Debtor’s books and records, the Order, and applicable law, the Trustee disputes that the Claimant has the claimed interest in Post-Petition Segregated Funds. The Debtor’s books and records demonstrate the following:

<u>Vendor Invoice #</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
65131	310.21	Invoice paid 08/19/2019	Yes
65104	238.50	Invoice paid 08/19/2019	Yes
65132	4,805.67	Invoice paid 08/19/2019	Yes
65083	5,186.56	Invoice paid 08/19/2019	Yes
64824	66.25	Client did not pay costs	Yes
64921	<b>45.16</b>	Invoice paid on 09/10/2019	Yes
64392	302.34	Invoice paid 08/19/2019	Yes
64391	3,960.09	Invoice paid 08/19/2019	Yes
64757	182.55	Invoice paid 08/19/2019	Yes
64756	274.22	Invoice paid 08/19/2019	Yes
64755	319.17	Invoice paid 08/19/2019	Yes
64753	5,545.58	Invoice paid 08/19/2019	Yes
64799	576.06	Invoice paid 08/19/2019	Yes
64636	<b>64.66</b>	Invoice paid on 09/10/2019	Yes
64138	270.30	Client not billed	Yes

Based on the same and other information, the Trustee maintains that (a) the Claimant is entitled to receive \$109.92 from the Post-Petition Segregated Funds and (b) all remaining amounts sought in the CAPE Claim should be disallowed for any and all purposes related to the Post-Petition Segregated Funds.

Pursuant to the Order, if you: (1) agree with the Trustee's position, she is authorized to distribute to the Claimant \$109.92, and the remaining portion of the claimed interest in the Post-Petition Segregated Funds may be released from the Segregated Account and placed in the Estate's operating account for use in the administration of the Chapter 7 Estate consistent with any cash collateral order entered by this Court; or (2) disagree with the Trustee's position, no said funds claimed therein shall be disbursed from the Segregated Account absent further order of the Bankruptcy Court and the Trustee will have the allowance/disallowance on said Claim in Post-Petition Segregated Funds heard by the Bankruptcy Court as further provided on the Notice of Hearing on Trustee's Disagreement with Amount Sought in Claim in Post-Petition Segregated Funds enclosed herewith.

Please feel free to contact me at [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com) with any questions. I look forward to hearing your position on this matter.

Very truly yours,

  
Paula S. Beran

cc: Lynn L. Tavenner, Trustee (w/out encl.)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**Notice of Hearing on Trustee's Disagreement with  
Amount Sought in Claim in Post-Petition Segregated Funds**  
Barrister Digital Solutions, LLC

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case by counsel, pursuant to the *Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*,<sup>2</sup> ECF. No. 383 (the "**Order**") hereby provides notice that she disagrees with the amount sought by Barrister Digital Solutions, LLC ("**Claimant**") in its Claim in Post-Petition Segregated Funds. Pursuant to the Order, a hearing on this matter will be held on **February 23, 2023, at 1 P.M.** (or such time thereafter as the matter may be heard) before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219. In accordance with Richmond General Order 22-2, unless ordered otherwise, the hearing will be conducted both in person and

---

<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

<sup>2</sup> Terms not otherwise defined herein shall have the meanings given them in the *Motion for Entry of an Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*, Docket No. 347.



via Zoom with a listen-only line available.

Zoom registration link:

[https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc\\_yNBzn2fS2zA4Uw](https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc_yNBzn2fS2zA4Uw)

Listen-only conference line:

Dial: 1-866-590-5055  
Access Code: 4377075  
Security Code: 22323

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: February 8, 2023  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of February 2023, a true and correct copy of the foregoing Notice has been sent to the Claimant as follows:

Barrister Digital Solutions, LLC  
Attn: Rita DeSilva  
1700 K ST. NW, Suite B-100  
Washington, DC 20006

Barrister Digital Solutions, LLC  
Attn: Rita DeSilva  
10790 Parkridge Boulevard, Suite 30  
Reston, VA 20191

/s/ Paula S. Beran  
Counsel

**Tavenner & Beran, PLC**

Exhibit E

ATTORNEYS AT LAW

PAULA S. BERAN  
PBERAN@TB-LAWFIRM.COM

20 NORTH EIGHTH STREET, 2ND FLOOR  
RICHMOND, VIRGINIA 23219  
TELEPHONE: (804) 783-8300  
FACSIMILE: (804) 783-0178

FILE NUMBER:

February 8, 2023

Schulman, Wiegmann & Associates, PA  
Attn: Barry J. Wiemann, CCR  
216 Stelton Roads, Suite O-1  
Piscataway, NJ 08854  
Bwiemann@swreporters.com

RE: LeClairRyan PLLC 19-34574-KRH

Dear Claimant,

Lynn L. Tavenner, Trustee, (the “**Trustee**”) and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, (the “**Debtor**”) is in receipt of the request (“**CAPE Claim**”) of Schulman, Wiegmann & Associates, PA (the “**Claimant**”) submitted in connection with the Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter, ECF No. 383 (the “**Order**”). After vetting the CAPE Claim against the Debtor’s books and records, the Order, and applicable law, the Trustee disputes that the Claimant has the claimed interest in Post-Petition Segregated Funds. The Debtor’s books and records demonstrate the following:

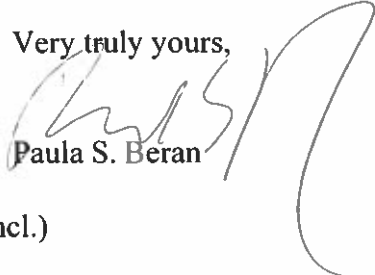
<u>Vendor Invoice #</u>	<u>Invoice date</u>	<u>Amount</u>	<u>Client Payment Status</u>	<u>Unpaid in AP</u>
77333	2/20/2019	2,731.66	The client did not pay for any costs.	yes
78331	5/6/2019	400.50	This charge has not been billed to the client. The client has not paid for this charge.	yes
78747	6/14/2019	2,500.30	This charge has not been billed to the client. The client has not paid for this charge.	yes
79062	7/9/2019	528.50	This charge has not been billed to the client. The client has not paid for this charge.	yes

Based on the same and other information, the Trustee maintains that (a) the Claimant is entitled to receive \$ 00.00 from the Post-Petition Segregated Funds and (b) all remaining amounts sought in the CAPE Claim should be disallowed for any and all purposes related to the Post-Petition Segregated Funds.

Pursuant to the Order, if you disagree with the Trustee's position and desire to continue to pursue your claim from the Post-Petition Segregated Funds, you must establish your entitlement at a hearing on February 23, 2023 as further provided on the Notice of Hearing on Trustee's Disagreement with Amount Sought in Claim in Post-Petition Segregated Funds enclosed herewith.

Please feel free to contact me at [pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com) with any questions. I look forward to hearing your position on this matter.

Very truly yours,

  
Paula S. Beran

cc: Lynn L. Tavenner, Trustee (w/out encl.)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**Notice of Hearing on Trustee's Disagreement with  
Amount Sought in Claim in Post-Petition Segregated Funds**

Schulman, Wiegmann & Associates, PA

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case by counsel, pursuant to the *Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*,<sup>2</sup> ECF No. 383 (the “**Order**”) hereby provides notice that she disagrees with the amount sought by Schulman, Wiegmann & Associates, PA (“**Claimant**”) in its Claim in Post-Petition Segregated Funds. Pursuant to the Order, a hearing on this matter will be held on **February 23, 2023, at 1 P.M.** (or such time thereafter as the matter may be heard) before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse,

<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

<sup>2</sup> Terms not otherwise defined herein shall have the meanings given them in the *Motion for Entry of an Order (I) Establishing Procedures Including a Bar Date to Claim an Interest in Certain Funds Held in a Segregated Account and (II) Authorizing the Distribution of Funds Thereafter and Memorandum in Support Thereof*, Docket No. 347.

Paula S. Beran, Esquire (Va. Bar No. 34679)

Tavenner & Beran, PLC

20 North Eighth Street, Second Floor

Richmond, Virginia 23219

Telephone: (804) 783-8300

*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

701 E. Broad Street Richmond, Virginia 23219. In accordance with Richmond General Order 22-2, unless ordered otherwise, the hearing will be conducted both in person and via Zoom with a listen-only line available.

Zoom registration link:

[https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc\\_yNBzn2fS2zA4Uw](https://www.zoomgov.com/meeting/register/vJlscemprTksExn9Ogrc_yNBzn2fS2zA4Uw)

Listen-only conference line:

Dial: 1-866-590-5055  
Access Code: 4377075  
Security Code: 22323

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: February 8, 2023  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of February 2023, a true and correct copy of the foregoing Notice has been sent to the Claimant as follows:

Schulman, Wiegmann & Associates, PA  
Attn: Barry J. Wiemann, CCR  
216 Stelton Roads, Suite O-1  
Piscataway, NJ 08854  
Bwiemann@swreporters.com

/s/ Paula S. Beran  
Counsel